

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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MEMO ENDORSED

April 2, 2025

BY ECF & EMAIL

Hon. Laura Taylor Swain
Chief District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. John Gass, 24-CR-523 (LTS)

Dear Chief Judge Swain:

The Defense writes with the consent of the government to request that the Court advance the currently scheduled change of plea on April 8, 2025 at 12:00 PM to 30 minutes earlier at 11:30 AM.

It is undersigned counsel's understanding that this adjustment is necessary for the Court to entertain the Defense's anticipated oral bail application after the change of plea.

Respectfully submitted,

/s/ Mitchell Schwartz
Mitchell E. Schwartz
Assistant Federal Defender
Federal Defenders of New York
52 Duane Street, 10th Floor
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The foregoing request is granted. DE 27 resolved.
SO ORDERED.

4/3/2025

/s/ Laura Taylor Swain, Chief USDJ